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December 20, 2024

***Via ECF***

The Honorable Sidney H. Stein  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Menendez, et al.*, 23 Cr. 490 (SHS)

Dear Judge Stein,

We write to request an extension of time, until January 15, 2025, by which Mr. Daibes must submit his sentencing memorandum. By order entered September 23, 2024 (ECF No. 617), Mr. Daibes's sentencing memorandum is due Thursday, January 2, 2025, just short of four weeks before sentencing. As the Court is aware, the parties have been engaged in a comparison of the approximately 3,000 exhibits believed to be provided to the jury on a laptop computer during its deliberations, against the exhibits admitted at trial. That has resulted in several filings and many pages of briefing, the latest of which were filed today. The comparison process is ongoing, and we need additional time to complete our sentencing memorandum.

Accordingly, we respectfully request that the Court extend our time to file Mr. Daibes's sentencing memorandum until January 15, 2025.

Respectfully submitted,

/s/

César de Castro  
Shannon McManus  
Seth Agata  
Valerie Gotlib

cc: All Counsel (*via* ECF)